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United States of America

6 IN THE UNITED STATES DISTRICT COURT

7 EASTERN DISTRICT OF CALIFORNIA

8 UNITED STATES OF AMERICA,

CASE NO. 1:24-CR-00209-KES-BAM

9 Plaintiff,

10 STIPULATION TO CONTINUE STATUS
CONFERENCE; AND ORDER

11 v.

12 JAMAR JONES et al,

13 Defendants.

14 IT IS HEREBY STIPULATED by and between Michele Beckwith, Acting United States Attorney
15 and Robert L. Veneman-Hughes, Assistant U.S. Attorney, as well as Eric Kersten, attorney for defendant
16 JAMAR JONES, and Anthony Capozzi, attorney for defendant STEPHANIE FERREIRA, and Steven
17 Crawford, attorney for defendant JERMEN RUDD that the status conference set for January 22, 2025 at 1:00
18 pm before the Honorable Barbara A. McAuliffe be continued to March 26, 2025 at 1:00 p.m.

20 **STIPULATION**

21 Plaintiff United States of America, by and through its counsel of record, and defendants, by and
22 through defendants' counsel of record, hereby stipulate as follows:

23 1. The parties need additional time to further investigate/explore matters related to resolving
the case or setting a trial date.

24 2. By this stipulation, defendants now move to continue the status conference, and to
exclude time from January 22, 2025 to March 26, 2025.

25 3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the initial discovery associated with this case includes investigative reports, and related documents, photographs, etc., in electronic form. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying. Defense would like additional time to review discovery, and investigate the foundation for a resolution by plea or trial further.

b) The government does not object to the continuance.

c) An ends-of-justice delay is particularly apt in this case because:

- Defendant needs additional time to review discovery, and conduct additional investigation; and
 - The parties need additional time to investigate/explore matters related to proceeding via plea or trial.

d) Based on the above-stated findings, the ends of justice served by continuing the trial date prescribed by the Speedy Trial Act.

e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of September 6, 2024 to March 26, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv) because it results from a continuance granted by the Court at defendants' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendants in a speedy trial.

[Remainder of page intentionally left blank.]

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

1 Dated: January 15, 2025

Respectfully submitted,

2 MICHELE BECKWITH
3 Acting United States Attorney

4 By /s/ Robert L. Veneman-Hughes
5 ROBERT L. VENEMAN-HUGHES
6 Assistant United States Attorney

7 Dated: January 15, 2025

8 /s/ Eric Kersten
9 ERIC KERSTEN
10 Attorney for Defendant Jamar JONES

11 Dated: January 15, 2025

12 /s/ Anthony Capozi
13 ANTHONY CAPOZZI
14 Attorney for Defendant Stephanie FERREIRA

15 Dated: January 15, 2025

16 /s/ Steven Crawford
17 STEVEN CRAWFORD
18 Attorney for Defendant Jermen RUDD

19 **ORDER**

20 IT IS SO ORDERED that the motion hearing set for January 22, 2025 is vacated and the status
21 conference is continued from January 22, 2025, to **March 26, 2025, at 1:00 p.m. in Courtroom 8 before**
22 **Magistrate Judge Barbara A. McAuliffe.** Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A) and
23 (h)(7)(B)(iv).

24 IT IS SO ORDERED.

25 Dated: January 15, 2025

26 /s/ Barbara A. McAuliffe

27 UNITED STATES MAGISTRATE JUDGE